

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants,
Interpleader Counter-Plaintiffs.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL DOCUMENTS
RELATING TO NOTICE OF COMPLIANCE WITH APRIL 8, 2022 ORDER**

In accordance with the Agreed Protective Order in this case (Dkt. 55), Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. respectfully seek leave to file under seal: (i) the unredacted version of the declaration of D. Matthew Doden (the “Doden Declaration”); (ii) the following exhibits being concurrently filed with the Doden Declaration (collectively, the “Confidential Materials”):

- i. Exhibit 15 is a highly sensitive, non-public document involving a presentation in a related matter;
- ii. Exhibit 21 is a signed letter from Rodney Atherton to Casey Kirschner, among others;
- iii. Exhibit 22 is a text message chain between Rodney Atherton and Casey Kirschner;
- iv. Exhibit 23 is a spreadsheet documenting financial figures in relation to several entities involved in this case;
- v. Exhibit 24 is a text message chain involving Casey Kirschner, Rodney Atherton, and “Carleton” (presumably, Nelson);
- vi. Exhibit 25 is an email exchange between Plaintiffs’ counsel and the United States Attorney’s Office for the Eastern District of Virginia;
- vii. Exhibit 33 is an unsigned letter from Rodney Atherton to Casey Kirschner, that is nearly identical to Exhibit 21.

Exhibits 15, 21, 22, 23, 24, 25, and 33 have been designated confidential under the Protective Order. And Exhibits 15, 21, 22, 23, and 24 have already been ordered sealed by this Court. *See* Dkt. 652. Moreover, Exhibit 33 is nearly identical to Exhibit 21, which this

Court has already ordered sealed. *Id.* Finally, the unredacted version of the Doden Declaration contains, describes, and refers to these materials.

Dated: April 18, 2022

Respectfully submitted,

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Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

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s/ Michael R. Dziuban

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